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7 SUSAN POLGAR

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA CHESS
12 FEDERATION, an Illinois non-for profit
13 corporation, RANDALL D. HOUGH, an
individual,

14 Plaintiffs,

15 vs.

16 SUSAN POLGAR, an individual, GREGORY
17 ALEXANDER, an individual, and DOES 1-10,
inclusive,

18 Defendants.
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Case No. 3:08-cv-05126-MHP

**DECLARATION OF SUSAN POLGAR IN
SUPPORT OF HER MOTION FOR
SUMMARY JUDGMENT**

Hearing Date: July 13, 2009
Time: 2:00 p.m.
Courtroom: Courtroom 15, 18th Floor
Judge: Hon. Marilyn Hall Patel

1 I, Susan Polgar, declare and state as follows:

2 1. I am a defendant in the present case, a dues-paying member of the USCF in good
3 standing and a member of the USCF Executive Board. The matters set forth herein are within
4 my personal knowledge and if called and sworn as a witness, I could competently testify thereto.

5 2. In December 2007, I learned that Kronenberger had been conspiring with various
6 USCF Executive Board members and others to interfere with my defense of the Sloan litigation.
7 Specifically, I discovered correspondence between Kronenberger and other members of the
8 Executive Board published on an internet website,
9 <http://groups.google.com/group/rec.games.chess.politics/topics>, that revealed that Kronenberger was
10 encouraging the USCF's insurer to deny her coverage during the same time that he was asking
11 me provide him with information to assist him with the USCF's investigation into Mottorshead's
12 allegations. When I confronted the other Board Members with this disclosure through email they
13 other Board Members did not respond.

14 I declare under penalty of perjury, under the laws of the State of California, that the
15 foregoing is true and correct. Executed on June 8, 2009 at San Francisco, California
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17 /s/ Susan Polgar

18 Susan Polgar
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